

## EXHIBIT 24

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION      MDL No. 2804  
OPIATE LITIGATION                      Case No. 17-md-2804

This document relates to:              Judge Dan  
   Aaron Polster

The County of Cuyahoga v. Purdue  
Pharma, L.P., et al.  
Case No. 17-OP-45005

City of Cleveland, Ohio vs. Purdue  
Pharma, L.P., et al.  
Case No. 18-OP-45132

The County of Summit, Ohio,  
et al. v. Purdue Pharma, L.P.,  
et al.  
Case No. 18-OP-45090

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Videotaped 30(b)(6) Deposition of the  
  
Drug Enforcement Administration  
  
through the testimony of Stacy Harper-Avilla  
  
Washington, D.C.

April 11, 2019

9:16 a.m.

Reported by: Bonnie L. Russo

Job No. 3282688

1 Unit No. 3. The time is 1:07.

2 You may proceed, Counsel.

3 BY MR. O'CONNOR:

4 Q. Welcome back.

5 A. Thank you.

6 MR. O'CONNOR: I'm going to mark two  
7 documents here as Exhibits 7 and 8.

8 (Deposition Exhibit 7 was marked for  
9 identification.)

10 (Deposition Exhibit 8 was marked for  
11 identification.)

12 BY MR. O'CONNOR:

13 Q. These are documents that appeared on  
14 DEA's website.

15 A. Okay.

16 MR. CHANDLER: Just so we are clear,  
17 Document 7 is the one updated January 13, 2010;  
18 is that right?

19 MR. O'CONNOR: That's correct.

20 MR. CHANDLER: And 8 is the January  
21 22nd.

22 MR. O'CONNOR: That's right.

23 BY MR. O'CONNOR:

24 Q. Starting with No. 7, which reflects  
25 the aggregate production quota history for

1 selective substances between 2000 and 2010.

2 Do you see that?

3 A. Yes.

4 Q. Do you recognize this chart?

5 A. I recognize the format of the chart,  
6 yes.

7 Q. Do you agree that it reflects the  
8 aggregate production quota history for the  
9 substances listed here on the left?

10 MR. ELSNER: Objection.

11 THE WITNESS: With the exception of  
12 2010, it reflects the aggregate production  
13 quota as finalized from 2000 to 2009.

14 BY MR. O'CONNOR:

15 Q. Okay. And with respect to 2010,  
16 what does it reflect?

17 A. It would reflect the established.

18 Q. And is it fair to state the  
19 established quota might change over the course  
20 of the year?

21 A. Correct.

22 Q. Let's look at No. 8, Exhibit 8.

23 A. Yes.

24 Q. And do you agree that this reflects  
25 the aggregate production quota history for the

1 substances listed on the left between the years  
2 2009 through at least 2018?

3 A. The final aggregate production  
4 quota, yes.

5 Q. And I want to direct your attention  
6 on Exhibit 7 to the lines that say: "Oxycodone  
7 (sale) and oxycodone (CONV)."

8 What does oxycodone (sale) mean?

9 A. That that is the aggregate  
10 production quota set for oxycodone that will go  
11 to dosage form manufacturers.

12 Q. Okay. And what does oxycodone  
13 (CONV) mean?

14 A. So CONV stands for conversion and  
15 that is the amount of oxycodone that will be  
16 converted to a different substance.

17 Q. And you agree that the numbers  
18 listed to the right of oxycodone (sale) reflect  
19 the final aggregate production quota for the  
20 years listed in the column headings?

21 MR. CHANDLER: Objection.  
22 Mischaracterizes prior testimony.

23 THE WITNESS: For 2000 through 2009,  
24 yes.

25 BY MR. O'CONNOR:

1 Q. Okay. So just to make sure I am  
2 reading this correctly, if we look in the  
3 column 2008, the number is for oxycodone (sale)  
4 70,000.

5 What does that 70,000 represent?

6 A. That 70,000 represents the DEA's  
7 estimated final number of the amount of  
8 oxycodone for sale that may be required to  
9 fulfill legitimate, scientific, medical,  
10 research, industrial needs, export as well as  
11 inventory requirements.

12 Q. Okay. And in coming to that number,  
13 did DEA take into account the factors that it  
14 was required to consider under the Controlled  
15 Substances Act?

16 MR. ELSNER: Objection.

17 THE WITNESS: Yes.

18 BY MR. O'CONNOR:

19 Q. And in coming to that number, did  
20 DEA consider the factors it was required to  
21 under the regulation related to aggregate  
22 production quota?

23 A. Yes.

24 Q. And with respect to the numbers  
25 listed for the other substances here, did the